

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : **CHAPTER 13**
Yongping Wang :
Debtor : **BANKRUPTCY NO.: 19-16681-amc**

RESPONSE TO CERTIFICATION OF DEFAULT

Debtor, by his attorney, Brandon J. Perloff, Esq., by way of Response to Movant's Certification of Default, represents the following:

1. The Debtor has the funds to cure the amounts alleged by Movant, in full.
2. The funds needed to cure are readily available and the debtor intends to tender them to the Movant without delay.

WHEREFORE, Debtor pray that a hearing be set on this matter.

Date: 8/31/2020

Respectfully submitted,

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
415 S. Broad Street, 2R
Philadelphia, PA 19147
Attorney for Debtor